

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Gregory A. Miller, M.D.,)
Plaintiff,)
v.)
MagMutual Insurance Company,)
Defendant.)
_____)
C/A No.: 0:24-cv-1212-SAL
EXHIBIT 1 TO RESPONSE TO MOTION
TO DISMISS AND STAY

Affidavit of Harry Goldberg, Esquire

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Gregory A. Miller, M.D.,) C/A No.: 0:24-cv-1212-SAL
)
 Plaintiff,)
)
 vs.) AFFIDAVIT
)
 MagMutual Insurance Company,)
)
 Defendant.)
)

Personally appeared before me, Harry L. Goldberg, who first being duly sworn, deposes and says that:

I am co-counsel for Dr. Gregory A. Miller in C/A No. 0:24-CV-1212-SAL which is pending in the United States District Court, District of South Carolina, Rock Hill Division.

I am also representing Dr. Miller in connection with post-judgment matters related to the case of *Patton v. Dr. Gregory A. Miller* which was originally brought in the Court of Common Pleas of York County. A judgment was entered against Dr. Miller in that case. An appeal by Dr. Miller is now pending before the S.C. Court of Appeals.

I have been informed by counsel for Patton, Ed Graham, Esquire, that he intends to pursue post-judgment supplemental proceedings against Dr. Miller in an effort to collect on the judgment which plaintiff obtained in the Patton case. In that regard, Mr. Graham has requested that I provide him with a date wherein he can depose Dr. Miller as to his personal assets. The deposition is presently scheduled for July 16, 2024.

Further deponent sayeth not.

Harry L. Goldberg

Sworn to before me this

13 day of June, 2024

Leigh T. Allen
Notary Public for South Carolina
My Commission Expires: 3/11/21